Message

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Sent: 1/3/2014 12:22:23 AM
To: Cepko, Russ P [Russ.Cepko@cbs.com]
CC: Brausch, Leo M [Leo.Brausch@cbs.com]; Robert.Krug@dtsc.ca.gov; diana.olson@hagerpacific.com; Dave.Rykaczewski@wspgroup.com; Wilson, Patrick [Wilson.Patrick@epa.gov]
BCC: Armann, Steve [Armann.Steve@epa.gov]; Lieben, Ivan [Lieben.Ivan@epa.gov]; Santos, Carmen [Santos.Carmen@epa.gov]
Subject: PCBs: Former Westinghouse Facility, Rancho Dominguez, California - Phase 1 Work - Risk Based Cleanup Application
Attachments: 4781_001.pdf; PCBs: USEPA R9 Request for TSCA PCB Notification and Cleanup Plan - Former Westinghouse Facility, Rancho Dominguez, California; Former Westinghouse Facility, Rancho Dominguez, California; RE: Former Westinghouse Facility, Rancho Dominguez, California

Dear Mr. Russell P. Cepko:

Thank you for your December 20, 2013 letter describing the "industrial cleaning" that CBS proposes to implement at the former Westinghouse facility in Rancho Dominguez, California.

On August 23, 2013 USEPA Region 9 (USEPA) requested that CBS submit for approval a risk-based PCB cleanup application (Application) under 40 CFR 761.61(c). Accordingly, USEPA considers CBS' "industrial cleaning" proposal to be the requested Application. Based on our review, the Application is incomplete. USEPA considers the work described in the proposal as the Phase 1 Work to be conducted under the Application. Consistent with 40 CFR 761.61(c), the Application including the Phase 1 Work is subject to USEPA approval before implementation by CBS. Below are conditions of approval that we anticipate including in the approval letter. Please call me after you have a chance to read this message.

The Phase 1 Work is subject to USEPA approval to assure that such work is conducted and completed in a manner that is protective of the tenants currently occupying the building and the environment. Therefore, USEPA believes that air sampling (consistent with USEPA air sampling methods) must be conducted inside the building under the Phase 1 Work and before CBS conducts the proposed initial cleanup. We consider the estimated 350 samples proposed by CBS for collection within the building, after removal of dust and completion of initial cleanup activities, to be additional characterization of PCBs within the building. We believe the objective of that characterization is to amend the Application that we received on December 20, 2013. As such, that additional characterization is subject to USEPA approval.

Future amendments to the Application are to address the Phase 2 PCB cleanup work including completion of the PCB cleanup inside the building, additional characterization of soils within the former Westinghouse facility and areas to where the PCBs have migrated (e.g., railroad spur), post-cleanup air sampling, reporting (e.g., cleanup completion report), record keeping, and restrictions for land use (i.e., restrictive land use covenant).

Accordingly, this e-mail message transmits USEPA's comments and requests additional information on the proposed Phase 1 Work. Before implementation, CBS must obtain USEPA's written approval of the Application.

Background

USEPA's September 20, 2013 e-mail message to Mr. Leo Brausch, granted CBS additional time to submit the risk-based PCB cleanup application (Application) under 761.61(c). CBS agreed to submit the Application on November 21, 2013. During the November 19, 2013 conference call with Mr. Brausch and representatives from the California Department of Toxic Substances Control (DTSC) and WSP, CBS indicated that it would immediately notify USEPA of the date by when CBS would submit the Application. Such notification by CBS did not occur. And on December 20, 2013 we received CBS' industrial cleaning proposal which USEPA considers it to be the Application requested in August 2013.

USEPA will approve the Application with conditions and key conditions of approval are presented below for CBS review. The Phase 1 Work must be implemented by CBS after receipt of USEPA's approval. USEPA can issue that approval by January 11, Dec g

USEPA's Draft Conditions of Approval, Comments, and Request for Additional Information - CBS' December 20, 2013 PCB Cleanup Application

1. **Submit the written certification.** CBS must submit the written certification required in 40 CFR 761.61(c) which must include the language in 761.61(a)(3)(i)(E) and be signed by both, the owner of the property and the cleanup party. In addition, we request the certification also include the paragraph under the definition of "Certification" in 40 CFR 761.3.

2. **Clarification. Purpose of the Phase 1 Work.** We understand that tenants currently occupy the building and have been at the premises for several years. Therefore, the key purpose of the Phase 1 Work in the Application is to prevent potential exposures to PCBs from occurring or continuing to occur inside and/or outside the facility's building. This encompasses obtaining baseline information for indoor air within the building. Preparing the building for additional characterization and cleanup is another goal of USEPA's approval and the Application.

    a. **Time frame to complete initial building cleanup and "temporary decontamination areas."** CBS estimates that it will take 27 working days and 14 working days to complete cleaning of about 150,000 square feet of non-porous surfaces and 30,000 square feet of visually stained porous surfaces in the building, respectively. Explain the measures that CBS will take to prevent potential tenant exposure to PCBs. Explain how CBS will prevent potential spread of PCB contamination onto areas occupied and/or in use by tenants.

3. **Submit a sampling and analysis plan (SAP) for approval.** CBS must submit a SAP to sample indoor air via USEPA Method TO-4A (for analysis of total PCBs in vapor and particulates), bulk dust accumulated on surfaces, bulk "material" from the drains inside the building, and coatings on porous surfaces (e.g., concrete, masonry) and metal (including Galbestos-like material). The minimum requirements for the SAP are described in the attached e-mail message addressed to Mr. Brausch and dated August 23, 2013. In addition, figures must be provided depicting the areas proposed for initial cleanup relative to the areas currently occupied and/or in use by the tenants.

    a. **Conduct indoor air sampling before initial building cleanup.** The indoor air sampling is to establish a baseline for total PCBs for comparison to post-cleanup (after conducting the initial and final PCB cleanups) indoor air sampling results. Outdoor air background sample(s) must be collected concurrently with the indoor air samples. USEPA recommends that high priority be given to indoor air sampling in all rooms currently in use and/or occupied by the tenants, and any area where PCBs may be present in building

materials based on the age (e.g., Galbestos, sealants, paint) of the building and visual staining. Provide figures depicting the locations where the air sampling will be conducted and such figures clearly identifying the layout of the building and areas being used or occupied by the current tenants.

The air samples must be analyzed via USEPA Method 1668C with a detection limit substantially lower than the Regional Screening Level (RSL) for total PCBs in air of 0.021 ug/m^3 that allow comparison of the analytical results to the RSL. Alternatively, CBS may analyze the air samples (particulate and vapor phase) via EPA Method 8082A under the condition that all detected PCBs are quantified by the laboratory including those PCBs not matching any Aroclor fingerprint. If Method 8082A is used, we request that Aroclor 1268 be added to the suite of Aroclors to be analyzed by that method.

b. **Collect discrete bulk dust samples.** Before the initial building cleanup, collect discrete bulk dust samples of sufficient quantity from areas where dust has accumulated. These samples must be extracted via USEPA Method 3540C or latest revision (Soxhlet extraction) and analyzed for total PCBs via USEPA Method 8082A or latest revision. Also, refer to Item 3.d. below.

c. **Collect discrete bulk samples of material accumulated in drains inside the building.** Discrete samples must be collected from each individual drain before removing this material and each sample individually analyzed for PCBs using same extraction and analytical methods as for bulk dust samples.

d. **Analytical detection limit for bulk samples (dust, material in drains).** The laboratory analytical detection limit must be substantially lower than the RSL of 0.74 mg/kg total PCBs (as Aroclors) to allow comparison of the analytical results to the RSL. This RSL is the risk-based concentration equivalent to a 10^{-6} risk (USEPA's point of departure for remediation projects), industrial exposure scenario. We request that Aroclor 1268 be added to the suite of Aroclors to be analyzed via Method 8082A.

e. **Post initial building cleanup.** CBS proposes to collect 100 surface wipe samples. The wipe samples must be extracted via Method 3540C (or latest revision) before analysis via Method 8082A. The detection limit for wipe samples must be equal to or less than 1 ug/100 cm^2. Wipe samples should also be collected from drain grates.

CBS also proposes to collect 200 concrete bulk samples from an 80,000 square foot section of the building floor; and 50 bulk samples from other porous surfaces (e.g., masonry) that are part of the building. Provide figures depicting the sampling grid and locations for porous surfaces. Based on historical operational activities, splashes of PCB containing oils and/or other PCB-containing liquids may have occurred onto walls inside the building. In addition, PCB-containing building materials may be present in the interior and exterior of the building. Therefore, clarify if bulk porous surfaces will also be collected from walls.

f. **Building ventilation system.** If the building has a ventilation system, collect bulk dust (if in sufficient quantity) and surface wipe samples (if not sufficient dust available for a dust bulk sample) to determine concentrations at which PCBs may be present. If the building has a ventilation system and PCBs are present, propose how CBS will clean up the system.

4. **Decontamination fluid.** Provide the name and description of the decontamination fluid. CBS' proposal only states that a "surfactant" will be used.

5. **Disposal.** CBS must determine the disposal facility for the waste that will be generated during the initial building cleanup. Disposal of PCB remediation waste (e.g., bulk dust, bulk material from building drains, absorbent contaminated with PCBs) must be based on the as-found PCB concentration (see Items 3.b. through 3.f.) and not on analysis of the waste after it has been consolidated in bags. PPE, rags, HEPA filters, and disposable sampling equipment must be disposed of in accordance with 40 CFR 761.61(a)(5)(v).

   Comment: CBS proposes to place waste containing PCBs into plastic bags and placing the plastic bags inside roll off bins for storage and subsequent transportation to the disposal site. Explain the measures that CBS will take to prevent leakage of PCB-containing liquids that may separate from the absorbent onto the plastic bag. The roll off bins must meet DOT specifications for containers to be used for storage of PCB-containing waste and kept locked. Each bag containing PCB Bags

6. **Movable equipment, sampling equipment, and tools.** CBS must conduct decontamination of movable equipment, sampling equipment, and tools consistent with 40 CFR 761.79(c)(2), (e), (f), and (g).

7. **Amendments to CBS' December 20, 2013 Application.** Within 60 days after the date of USEPA's approval, CBS must submit an amendment to the Application for Phase 2 Work. Among other things, the Phase 2 Work includes completion of the PCB cleanup inside the building, additional characterization of soils within the former Westinghouse facility and areas to where the PCBs have migrated (e.g., railroad spur), post-cleanup air sampling, reporting (e.g., cleanup completion report), record keeping, and restrictions for land use (i.e., restrictive land use covenant).

8. **Sources of PCBs.** Non-liquid PCB sources may be present in the building based on age of construction. Additional characterization of PCBs in the building is necessary to verify the absence or presence of PCB-containing building materials not authorized for use.

Sincerely,

Carmen D. Santos
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"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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